

UNITED STATES DISTRICT COURT

for the

Central District of California

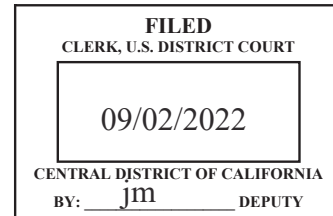
United States of America

v.

Sam Nang Bou,

Defendant

Case No. 2:22-mj-03483-DUTY



**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of June 28, 2022 in the county of Los Angeles in the Central District of California, the defendant violated:

*Code Section**Offense Description*

18 U.S.C. § 841(a)(1), (b)(1)(A)(ii)(II)

Distribution of Cocaine

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

/s/ Hannah Monroe
Complainant's signature

Hannah Monroe, Special Agent
Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 09/02/2022

/S/
Judge's signature

City and state: Los Angeles, California

Hon. Michael R. Wilner, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT

I, Hannah Monroe, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Sam Nang Bou ("BOU") for a violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(ii)(II) on June 28, 2022 (distribution of cocaine).

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

I. BACKGROUND OF AFFIANT

3. I am a Special Agent of the Federal Bureau of Investigation ("FBI"), United States Department of Justice, and have been so employed for approximately six years. Prior to becoming a Special Agent, I was a Staff Operations Specialist with the FBI for approximately two and a half years. I am currently a member of the FBI's violent crime major offenders squad in Long Beach, California.

4. Since joining the FBI in 2014, I have received training in the investigation of violations of criminal law, such as drug-

trafficking, computer-related crimes, and financial fraud, including several hundred hours of formal training at the FBI Training Academy in Quantico, Virginia. During the time that I have been employed by the FBI, I have participated in investigations relating to organized crime, home-grown violent extremism, access device fraud, identity theft, narcotics, and computer intrusions. I have participated in many aspects of criminal investigations including the issuance of subpoenas, reviewing evidence, conducting electronic and physical surveillance, working with informants, and the execution of search and arrest warrants. Additionally, I have interviewed and/or debriefed informants and other witnesses who had personal knowledge regarding the subject matters of the investigations in which I have been involved, including narcotics trafficking and firearms offenses.

II. SUMMARY OF PROBABLE CAUSE

5. The FBI and other law enforcement agencies are investigating a drug trafficking organization ("DTO") that is conspiring to traffic and export hundreds of kilograms of cocaine and methamphetamine from Los Angeles to Canada via long haul semi-trucks. Two stash house locations in Alhambra, California have been identified and, based on the investigation so far, it appears that they are being run by Canadian members of the DTO, including Sam BOU ("BOU") and others, who rotate and come down from Canada to the stash houses and conduct the hand-offs to the semi-truck drivers. Law enforcement has seized approximately 333 kilograms of cocaine and 1008 pounds of methamphetamine that BOU has distributed and possessed with intent to distribute from September 2021 to August 2022.

III. STATEMENT OF PROBABLE CAUSE

6. Based on my training and experience, my review of investigative reports, my participation in this investigation, and my conversations with other law enforcement officers regarding the investigation, I know the following information.

A. RCMP Identified 320 N. Marguerita Ave #4 in Alhambra, California as a Stash House

7. In August 2021, members of the Royal Canadian Mounted Police ("RCMP") contacted law enforcement officers of the Orange County Regional Narcotics Suppression Narcotics Program ("RNSP") and informed them that the RCMP had information that a residence located at 320 N. Marguerita Ave. #4, in Alhambra, California (the "Alhambra Residence") was being used by Canadian drug trafficking members to store narcotics for future transportation to Canada.¹

8. On August 17, 2021, members of RNSP set up surveillance on the Alhambra Residence and observed two men who appeared to reside at the residence and were subsequently identified as BOU and Kasjaniuk.² According to RCMP officers, Enterprise-Rent-A-Car records and copies of their Canadian driver's licenses that I have reviewed, I know that BOU and Kasjaniuk are Canadian citizens, and periodically come to the Los Angeles area.

¹ All dates and times referenced in this affidavit are approximate.

² On or about October 26, 2021, at approximately 9:00 p.m., Monterey Park Police Department Officer Wukelich conducted a traffic stop of the vehicle that RNSP officers were surveilling and saw leave the Alhambra Residence. Officer Wukelich asked the driver and passenger for their license and determined that the two occupants in the vehicle were BOU and Kasjaniuk based on the Canadian drivers' licenses that they provided and were photographed by Officer Wukelich.

B. Seizure #1: 53 Kilograms of Cocaine on September 2, 2021

9. On September 2, 2021, at 9:30 a.m., four RNSP officers (Officers Garrido, Verhulst, Packham, and Perez) established surveillance at and around the Alhambra Residence. Based on my review of the RNSP surveillance report and my conversations with the RNSP officers, I learned the following:

a. At 1:38 p.m., RNSP officers observed BOU leave the Alhambra Residence driving a black Mazda CX-5 bearing California license plate number 8UNL058 ("Mazda CX-5"). Investigators had previously run the license plate and learned the vehicle belonged to Enterprise-Rent-A-Car.³ After picking up a weighted cardboard box from someone at a side street in Alhambra and a weighted bag from another person at a gas station in Alhambra, BOU traveled to the city of Ontario, California. At 5:00 p.m., BOU drove up to a white semi-truck bearing Canadian license plate no. R33-68H. The semi-truck was parked along the curb. BOU got out of the Mazda CX-5 and walked over to the driver of the semi-truck, a man later identified by Las Vegas Metro Police Department ("LVMPD") Detective J. Baumbach as Sami Binyamin ("Binyamin"). The two talked briefly before BOU returned to the Mazda CX-5 where he retrieved two black weighted bags from inside the vehicle. The bags appeared to be heavy. BOU handed one of the bags to Binyamin and the two walked to the cab of the semi-truck. Binyamin loaded both bags inside the cab of the semi-truck. BOU walked away from Binyamin and returned to the Mazda CX-5, entered, and drove away.

³ On or about August 8, 2022, I received a subpoena return from Enterprise-Rent-A-Car, which revealed that the vehicle was rented by Kasjaniuk on August 9, 2021 until September 7, 2021.

b. The semi-truck traveled a few miles down the road before stopping on the side of the street. A man, later identified by LVMPD Detective Baumbach as Valeri Davidov ("Davidov"), emerged from the sleeper area of the semi-truck and got into the front passenger seat. Binyamin then entered the sleeper area and out of sight for 5-10 minutes before re-emerging and getting back into the driver seat. The semi-truck then proceeded to the 15-freeway northbound. RNSP officers maintained constant surveillance of the semi-truck until it was eventually pulled over, as set forth below.

c. As the semi-truck approached the California-Nevada border, investigators contacted the Las Vegas Metro Police Department ("LVMPD") and requested a unit to conduct a traffic stop.

10. According to the LVMPD report of the incident, I learned the following:

a. At 10:30 p.m., LVMPD Detective Baumbach saw the semi-truck crossing over the white line separating the shoulder of the highway from the travel lane several times, so he stopped the semi-truck at mile marker 11 on the I-15 freeway in the city of Primm, Nevada. Upon stopping the vehicle, Detective Baumbach approached the driver, asked for his license, and determined that his name was Binyamin from the Canadian driver's license that he provided. The passenger was identified as Davidov from his Canadian driver's license. Two other LVMPD detectives arrived to assist, Detectives T. Robichaud and Detective E. Calata. According to Detective Baumbach's report, he observed Binyamin to be extremely nervous, as his hands were shaking as he handed his driver's license to the detective. Binyamin was asked for consent to search his vehicle which Binyamin granted verbally as well as via a written consent

form. Detective Calata searched the cab portion of the semi-truck and found two large duffle bags in the sleeper area of the cab containing a number of vacuum-sealed bricks. LVMPD determined that there was a total of 53 bricks of what the Drug Enforcement Administration ("DEA") laboratory later determined was a total of 52.1 kilograms of cocaine.

11. On August 12 and August 23, 2022, I showed RNSP surveillance officers photographs of the duffle bags containing the cocaine and they confirmed the bags depicted in the photographs were consistent with the bags they observed on surveillance. I also showed the RNSP surveillance officers a photograph of BOU and they confirmed that that was the individual who handed off the duffle bags.

C. Seizure #2: 52 Kilograms of Cocaine on September 7, 2021

12. On September 7, 2021, at 9:00 a.m., five RNSP officers again established surveillance at and around the Alhambra Residence (the same four officers from the September 2 surveillance and also Officer Boyington). Based on my review of the RNSP surveillance report and my conversations with RNSP officers, I learned the following:

a. At 9:00 a.m., RNSP officers saw the Mazda CX-5 leave the Alhambra Residence and go to an Enterprise-Rent-A-Car location in Pasadena, and then return to the Alhambra Residence.

b. At 2:00 p.m., RNSP officers saw BOU leave the Alhambra Residence driving the Mazda CX-5. BOU traveled to a shipping warehouse located at 9449 Santa Anita Ave., in Rancho Cucamonga, California. Once inside the warehouse parking lot, BOU drove up to a blue semi-truck bearing California license plate

number 4TU9690. BOU got out of the Mazda CX-5 and opened the rear hatch of the Mazda. The driver of the semi-truck, later identified by LVMPD Detective Robichaud as Sonu Singh ("Singh"), approached BOU and BOU handed the driver a brown cardboard box. Singh took the box to the driver side of the semi-truck while BOU followed the driver carrying another brown cardboard box. BOU returned to the Mazda CX-5 and picked up a third box from the rear cargo area and carried it over to the driver side of the semi-truck towards the cab and out of sight of the surveillance team. BOU walked back to the Mazda CX-5, got inside, and drove away. RNSP units followed the semi-truck, which proceeded to drive north on the 15 freeway. RNSP officers maintained constant surveillance of the semi-truck until it was eventually pulled over, as set forth below.

c. The semi-truck crossed the California-Nevada border and investigators contacted LVMPD and requested a unit to conduct a traffic stop of the semi-truck.

13. According to the LVMPD report of the incident, I learned the following:

a. At 7:50 p.m., LVMPD Detective Robichaud saw the semi-truck cross the white line separating the travel lanes several times, and then after moving into the number three travel lane, the detective saw the semi-truck cross the fog line separating the travel lane from the shoulder approximately six times. Believing that the driver might have been impaired or distracted, Detective Robichaud pulled the semi-truck over on the I-15 freeway at mile marker 10. Detective Robichaud walked up to the passenger side of the semi-truck and saw that the driver was the sole occupant. Detective Robichaud asked the driver for his license, and determined

that his name was Sonu Singh ("Singh") based on the California driver's license that he provided. According to the detective, during the encounter, Singh was visibly nervous, as he was talking fast, constantly licking his lips, and was trembling. Detective Robichaud then went to his police vehicle to conduct a records check and Detective Calata arrived on scene to assist. After conducting the check, Detective Robichaud walked back to Singh and asked Singh to get out of the truck so that he could obtain more details about Singh's travels. Then, Detective Robichaud returned the driver's license to Singh and told Singh that he would only be giving Singh a verbal warning for failing to maintain inside the travel lanes. Detective Robichaud then asked Singh for consent to search the semi-truck which he granted verbally and via a written consent form. Detective Robichaud searched the cab while Detective Calata searched the trailer. Detective Robichaud found three cardboard boxes inside of the cab (one on the lower bed, and two in the storage compartment under the bed), which contained heat-sealed packages. Detective Baumbach conducted a field test of the substance, which returned positive for cocaine. LVMPD ultimately determined there were 52 bricks in total.

14. On August 22, 2022, I took custody of the suspected drugs and submitted them to DEA for laboratory testing.

15. On August 12 and August 23, 2022, I showed RNSP surveillance officers photographs of the boxes containing the cocaine and they confirmed the boxes depicted in the photographs were consistent with the boxes they observed on surveillance. I also showed RNSP surveillance officers a photograph of BOU and they

confirmed that was the individual that handed off the boxes to Singh.

D. Seizure #3: 51 Kilograms of Cocaine on September 28, 2021

16. On September 28, 2021, at 8:00 a.m., four RNSP officers established surveillance at the Alhambra Residence (Officers Garrido, Novinger, Boyington, and Packham). Based on my review of the RNSP surveillance report and my conversations with RNSP officers, I learned the following:

a. At 8:15 a.m., RNSP officers observed via a state-authorized GPS tracker that was placed on an Enterprise-Rent-A-Car silver Chrysler Pacifica (the "Chrysler Pacifica")⁴ bearing California license plate number 8VGE676 which BOU and Kasjaniuk had been observed previously driving, leave the Alhambra Residence. The Chrysler Pacifica traveled to the city of Barstow, California where surveillance units caught up with it and observed the vehicle parked in front of a white semi-truck bearing California license plate number XP95394 that was parked along the curb. RNSP officers observed the rear hatch of the Chrysler Pacifica open.

b. The driver of the semi-truck, later identified by an Arizona Department of Public Safety Trooper as Gupreet Singh, met with BOU and Kasjaniuk. RNSP officers observed BOU and Kasjaniuk retrieve objects from the Chrysler Pacifica and carry them towards the semi-truck and out of sight. BOU and Kasjaniuk walked back to the Chrysler Pacifica, got inside, and departed the area. Gupreet Singh entered the driver's side of the semi-truck and also departed.

⁴ On or about August 8, 2022, I received a subpoena return from Enterprise-Rent-A-Car which revealed that this vehicle was rented by Kasjaniuk on September 27, 2021 until October 4, 2021. The driver's license on file with Enterprise is Alberta Driver's License Number 160422935.

c. RNSP officers continued to follow the semi-truck to the I-40 freeway eastbound and as it crossed the California-Arizona border. Investigators contacted the Arizona Department of Public Safety and requested a traffic stop of the semi-truck. RNSP officers maintained constant surveillance of the semi-truck until it was eventually pulled over, as set forth below.

17. According to the Arizona Department of Public Safety report of the incident, I learned the following:

a. At 3:35 p.m., Trooper Dyson with the Arizona Department of Public Safety saw the semi-truck travel along the I-40 freeway at approximately 10 mph below posted speed limit and as it drove closer to Trooper Dyson's vehicle, it began to slow down even further. Trooper Dyson ran records checks on the semi-truck and learned that the trucking company had a poor safety rating (77 out of 100 - the higher the number the worse the rating). It was recommended by the Federal Motor Carrier Safety Administration that an inspection be completed based on this safety rating. Based on that information, Trooper Dyson conducted a traffic stop of the vehicle, and was assisted by Trooper Dickinson.

b. Trooper Dyson walked up to the passenger side of the semi-truck and saw that the driver was the sole occupant. Trooper Dyson identified the driver as Gupreet Singh based on his temporary California driver's license. Trooper Dyson asked Gupreet Singh questions about his travel and determined that there were inconsistencies between Singh's statements and with common standards and practices in the trucking industry.⁵ Trooper Dyson performed a

⁵ For example, based on the report, Gupreet Singh stated that he was coming from California and was en route to Wisconsin; however, the Trooper noted that the I-40 was not the most direct route

"level 2 inspection" where he checked the cargo and load securement, and in doing so, noticed that some of the pallets appeared to be tampered with. Trooper Dyson asked Gupreet Singh if he watched the trailer get loaded, and Gupreet Singh said he did not because it took 11 hours. Trooper Dyson noted in his report that based on his training and experience, a palletized partial load would only take approximately 30 minutes. According to his report, Trooper Dyson continued filling out his inspection paperwork and asked Gupreet Singh more questions about his trucking route and the load, and Trooper Dyson noted more inconsistencies, and also observed nervous behavior, including Gupreet Singh biting his nails and laughing out of place. After completing the inspection report and asking Gupreet Singh to sign it, Trooper Dyson asked permission to search the truck and trailer, to which Gupreet Singh granted both verbally and via written consent. Trooper Dickinson found two duffle bags under the bunk inside of the cab. Trooper Dyson opened one of them and saw multiple vacuum-sealed packages containing kilogram-sized bricks. The duffle bags were turned over to the Mohave County Sheriff's Department, and Detective Huerta determined that there were 51 bricks in total.

18. DEA agents subsequently took custody of the bricks and sent them to a DEA laboratory for testing. The DEA laboratory ultimately determined that there was a total of 50.8 kilograms of cocaine.

between those two locations. In addition, Trooper Dyson saw from the shipping papers that it was only a partial load, which Trooper Dyson determined was inconsistent with a legitimate trucking business.

19. On August 12 and August 23, 2022, I showed RNSP surveillance officers a photograph of BOU and Kasjaniuk and they confirmed that they were the individuals that handed off numerous objects to the driver of the semi-truck.

E. Seizure #4: 89 Kilograms of Cocaine on June 6, 2022

20. During the investigation, RCMP officers informed me that at some point after the October 11, 2021 seizure, BOU had travelled back to Canada and stayed up there for some time. RCMP officers then informed me that in May 2022, BOU returned to Los Angeles from Canada.

21. On June 6, 2022, at 11:00 a.m., five RNSP officers established surveillance at and around 1126 W. Shorb St. Apt #1, in Alhambra, California (the "Shorb Residence") (Officers Garrido, Boyington, Packhan, Millen, and Winners).⁶ Based on my review of the RNSP surveillance report and my conversations with the RNSP officers, I learned the following:

a. At 1:30 p.m., RNSP officers observed BOU and an individual that investigators had previously identified as Fernando Zamora-Castillo⁷ leave the Shorb Residence driving a black Jeep Cherokee ("Jeep Cherokee") bearing California license plate number

⁶ Based on prior surveillance operations, RNSP learned that BOU moved his temporary residence from the Alhambra Residence to here.

⁷ On or about April 27, 2022, investigators were reviewing surveillance footage from the Alhambra Residence and observed a vehicle with California License Plate #8RVY712. Investigators ran the plate which came back to Avis Rental Cars. On or about April 27, 2022, Detective Boyington called Avis and a law enforcement representative informed Detective Boyington that the vehicle was rented to Fernando Zamora-Castillo with a Canadian address. Investigators contacted the RCMP and obtained a photograph of Castillo. During a surveillance on or about May 5, 2022, RNSP officers observed Castillo and confirmed it was the same individual in the photograph provided by RCMP.

9ADK902.⁸ The vehicle drove to Colton, California where it parked in front of a black semi-truck bearing Indiana license plate number 2977848 with trailer plate number P879083. BOU got out of the Jeep Cherokee, approached the semi-truck and got into the passenger seat. BOU and the driver, later identified by Officer DeVries as Amanpreet Singh ("A. Singh"), talked for a brief time. BOU got out of the semi-truck and got back into the Jeep Cherokee and drove in tandem with the semi-truck to an adjacent street.

b. BOU and Castillo got out of the Jeep Cherokee. BOU opened the rear hatch of the vehicle and they both took out weighted brown cardboard boxes and walked over to the passenger side of the semi-truck. A. Singh opened the passenger door of the semi-truck and loaded a total of three boxes into the semi-truck cab. BOU and Castillo got back into the Jeep Cherokee and departed the area. RNSP officers continued to follow the semi-truck as it proceeded to the 15 freeway and eastbound on the 40 freeway. The semi-truck crossed the California-Arizona border and investigators contacted the Mohave County Sheriff's Office to conduct a traffic stop in Arizona. RNSP officers constantly maintained surveillance on the semi-truck until the traffic stop occurred, as set forth below.

22. According to a Mohave County Sheriff's Office report of the incident, I learned the following:

a. The same day, on June 6, 2022, at 7:00 p.m., Deputy McCleary conducted a traffic stop of the semi-truck for bypassing a weigh station and identified the driver as A. Singh, based on his Indiana driver's license. Officer McCleary obtained verbal consent

⁸ On or about August 8, 2022, I received a subpoena return from Enterprise-Rent-A-Car, which revealed that the vehicle was rented by BOU on May 31, 2022 until June 13, 2022.

to search the vehicle. Upon searching the vehicle, investigators located three large boxes on the top bunk of the sleeper berth in the cab of the semi-truck containing bricks of what appeared to be cocaine.

23. DEA agents subsequently took custody of the suspected drugs and submitted them to a DEA laboratory for further testing. A DEA laboratory later determined that there was a total of 88.8 kilograms of cocaine.

24. On August 12 and August 23, 2022, I showed RNSP surveillance officers a photograph of BOU and Castillo and they confirmed that they were the individuals that handed off the boxes to driver of the semi-truck.

F. Seizure #5: 105 Kilograms of Cocaine on June 28, 2022

25. On June 28, 2022, at 9:00 a.m., four RNSP officers established surveillance at and around the Shorb Residence (Officers Garrido, Boyington, Packham, and Millen). Based on my review of the RNSP surveillance log and conversations with the RNSP officers, I learned the following:

a. Shortly after 6:00 p.m., RNSP officers saw BOU and Castillo leave the Shorb Residence. BOU was in the driver's seat of black Hyundai Tucson bearing California license plate number 8RZG553 ("Hyundai Tucson").⁹ Castillo was in the passenger seat of the vehicle and the two drove to Hesperia, California where they parked in front of a white semi-truck bearing California license plate number 4TN8200. Castillo opened the rear hatch of the Hyundai Tucson and, along with BOU, they each retrieved a weighted brown

⁹ On or about August 8, 2022, I received a subpoena return from Enterprise-Rent-A-Car, which revealed that the vehicle was rented by BOU on June 13, 2022 and returned on June 29, 2022.

cardboard box from the rear cargo area and walked them to an open passenger door of the semi-truck where the driver, later identified by Arizona Department of Public Safety Trooper T. Dickinson as Kewal Garg ("Garg"), was standing. The driver then loaded the boxes into the semi-truck cab. A total of four boxes were loaded into the cab. BOU and Castillo got back into the Hyundai Tuscon and departed the area. The driver got back into the driver's side of the semi-truck and proceeded to drive to the northbound 15 freeway. Approximately 15-20 minutes after departing, the semi-truck got a flat tire. Garg and another individual, later identified by Trooper Dickinson as a man with a last name of Yogeshwar, emerged from the passenger side. Constant surveillance was maintained on the semi-truck. The semi-truck crossed into Arizona and investigators requested the Arizona Department of Public Safety to conduct a traffic stop.

26. Based on the Arizona Department of Public Safety report of the incident, I learned the following:

a. On June 29, 2022, at 3:59 a.m., Trooper Dickinson conducted a traffic stop of the semi-truck for crossing over the right lane divide several times. The driver of the semi-truck was identified by his California driver's license as Garg and the passenger as Yogeshwar based on his California driver's license. Trooper Dickinson saw that Garg was exhibiting nervous behavior, as he was licking his lips and teeth, and was trembling. Trooper Dickinson was concerned that he was under the influence, so he had Garg perform field sobriety tests, which Garg did not successfully complete. Garg claimed he was diabetic. Trooper Dickinson then spoke to Yogeshwar and asked if Garg had any medical conditions. Yogeshwar said that Garg was a senior citizen. Trooper Dickinson

asked Yogeshwar to step out of the semi-truck, which he did and Trooper Dickinson noticed that the pulse of Yogeshwar's neck was rapid. Trooper Dickinson asked Yogeshwar for consent to search the semi-truck, which Yogeshwar granted. A K-9 sniff was also conducted on the vehicle and the K-9 alerted to the presence of narcotics.

b. Trooper Dickinson searched the cab and found a cardboard box on the bottom bunk, which contained plastic wrapped bundles. Three more boxes were found on the top bunk. There was a total of 105 bundles, two of which were field tested and determined to be cocaine.

27. DEA agents subsequently took custody of the suspected drugs and submitted them to a DEA laboratory for further testing. The DEA laboratory later confirmed that there was a total of 104.6 kilograms of cocaine.

28. On or about August 12 and August 23, 2022, I showed RNSP surveillance officers photographs of the boxes containing the cocaine and they confirmed the boxes depicted in the photographs were consistent with the boxes they observed on surveillance. I also showed RNSP officers photographs of BOU and Castillo which they confirmed were the same individuals that met with the drivers of the semi-truck and passed off boxes.

G. Seizure #6: 508 Pounds of Methamphetamine on August 16, 2022

29. On or about August 16, 2022, at 9:30 a.m., five RNSP officers established surveillance at and around the Shorb Residence (Officers Garrido, Verhulst, Packham, Millen, and Boyington). Based on my review of the RNSP surveillance report and my conversations with RNSP officers, I learned the following:

a. At 7:21 p.m., RNSP officers observed BOU and Castillo depart the Shorb Residence driving a red Jeep Cherokee ("Red Cherokee") bearing California license plate number 8ZXY141.¹⁰ BOU was in the driver's seat and Castillo in the passenger seat. The two drove to the city of Castaic and into a residential area. The Red Cherokee drove next to a Range Rover ("Range Rover") and the Range Rover appeared to follow the Red Cherokee for a short distance before parking behind one another in a residential neighborhood. BOU and Castillo got out of the Range Rover and an east Indian man with a beard, later identified by California Highway Patrol ("CHP") Officer Ashe as Malwinder Singh ("Malwinder"), exited the driver's side of the Range Rover and another east Indian man, later identified by CHP Officer Ashe as Sartajbir Singh ("Sartajbir"), exited the passenger side. The four briefly met with one another and appeared to engage in conversation. Castillo opened the rear hatch of the Red Cherokee. Malwinder and Sartajbir each carried one large brown cardboard box to the side of the rear doors of the Range Rover. Castillo handed BOU two additional brown cardboard boxes while Malwinder and Sartajbir opened the rear hatch of the Range Rover, met BOU with the boxes, and loaded them inside. One of the boxes was carried to the back seat. BOU traveled back and forth two additional times with large cardboard boxes that was loaded by Malwinder and Sartajbir in the rear hatch. A total of three cardboard boxes were loaded in the rear seat and three boxes in the

¹⁰ On August 16, 2022, I spoke with a representative at Avis Car Rentals and they informed me that Castillo rented the vehicle under his name on August 2, 2022. The driver's license on file with Enterprise is Alberta Driver's License Number 148625890.

rear hatch. BOU and Castillo parted with Malwinder and Sartajbir and drove away. Malwinder got into the driver's seat of the Range Rover and Sartajbir got into the passenger seat. RNSP officers remained surveillance on the Range Rover as it drove to the city of Bakersfield. Investigators contacted California Highway Patrol ("CHP") and requested the Range Rover to be traffic stopped.

30. According to the CHP report of the incident and a follow-up report by Kern County Sheriff's Office, I learned the following:

a. At 9:42 p.m., CHP Officer Ashe conducted a traffic stop of the Range Rover for tinted windows, in violation of California Vehicle Code § 26708(a), on the 99 Northbound freeway north of 7th Standard Rd., in Bakersfield, California. Officer Ashe approached the driver of the Range Rover who was identified by his California driver's license as Malwinder. The passenger was identified by his international driver's license as Sartajbir. During Officer Ashe's interaction with Malwinder, he appeared nervous and his hands were shaking. Officer Ashe conducted a K-9 sniff of the vehicle and his K-9 alerted to the odor of narcotics. Officer Ashe conducted a search of the vehicle and observed three boxes sitting on the rear passenger seat and three additional boxes in the rear cargo area. The boxes contained clear plastic packages with a white crystal substance inside which appeared to be methamphetamine. The substance was not field tested due to fentanyl safety concerns.

31. On or about August 21 and August 23, 2022, I showed RNSP surveillance officers a photo of BOU and Castillo and they confirmed these were the individuals that conducted an exchange with the driver and passenger of the Range Rover. I also showed RNSP

surveillance officers photographs of the cardboard boxes that were seized by CHP. They confirmed the items depicted in the photographs were consistent with the items they observed on surveillance.

H. Seizure #7: 500 Pounds of Methamphetamine on August 23, 2022

32. On or about August 23, 2022, at 9:30 a.m., five RNSP officers established surveillance at and around the Shorb Residence (Officers Garrido, Verhulst, Packham, Millen, and Boyington). Based on my review of the RNSP surveillance report and my conversations with RNSP officers, I learned the following:

a. At 2:35 p.m., RNSP officers observed BOU departing the Shorb Residence driving a grey Dodge Durango (the "Dodge Durango") bearing California license plate number 8VWN680.¹¹ BOU drove to the city of Ontario to an industrial area where he parked along a curb behind a white semi-truck bearing trailer Washington license plate number 73201AG.

b. BOU got out of the Dodge Durango and approached the passenger side of the semi-truck and out of sight of surveillance. Approximately one minute later, BOU emerged empty-handed and got back into the driver's seat of the Dodge Durango. The driver of the semi-truck, later identified by CHP Officer Walter Aguayo as Inderpreet Singh Brar ("Brar"), got out of driver's side of the semi-truck and walked back to the Dodge Durango and appeared to engage in a conversation with BOU.

33. Brar then walked to the rear of the trailer and opened the right trailer door and began to look inside. RNSP officers saw that

¹¹ On August 24, 2022, I spoke with a representative from Enterprise-Rent-A-Car. The representative informed me that BOU rented the Dodge Durango under his name on August 22, 2022.

the trailer was full of brown cardboard boxes. Brar then closed the trailer door. BOU drove the Dodge Durango to a nearby parking lot and sat in the driver's seat for approximately 20 minutes. Brar got back into the semi-truck and drove it approximately 300 yards forward along the same curb, parked, and got out once again. Brar went back to the rear of the trailer and opened up both trailer doors and got inside the trailer. Brar appeared to be moving boxes around for several minutes before closing the doors and getting back into the driver's seat of the semi-truck.

34. BOU drove back to the semi-truck, backed the Dodge Durango up so the rear hatch was facing the trailer doors. BOU got out of the Dodge Durango, opened the rear hatch, and grabbed a tool bag. BOU placed the tool bag by the rear trailer doors. Brar got out of the semi-truck and walked back to the rear of the trailer and opened both doors. Brar climbed up into the trailer while BOU walked over to the rear hatch of the Dodge Durango and retrieved a weighted cardboard box with black bands around it. BOU set the box on the floor of the trailer and Brar picked the box up and placed it deeper inside the trailer. This was repeated five additional times until six large, weighted cardboard boxes with black bands were loaded into the semi-truck. BOU grabbed his tool bag and laid underneath the trailer for approximately 30 seconds. BOU did not appear to be working on the trailer. Brar climbed out of the trailer, closed the doors, and got into the driver's seat of the semi-truck. BOU walked back to the Dodge Durango, got inside, and departed the area.

35. RNSP officers remained surveillance on the semi-truck as it drove to the city of Victorville. Investigators contacted CHP and requested the semi-truck to be traffic stopped.

36. According to my conversations with CHP officers and my review of the CHP report of the incident, I learned the following:

a. CHP Officer Vargas located the semi-truck on the 15 North Freeway and observed the truck traveling over the posted 55 miles per hour posted speed limit. The truck had also failed to stop at a mandatory weigh station several miles back. Officer Vargas initiated a traffic stop of the semi-truck. Officer Aguayo joined the traffic stop and spoke with Brar. Brar provided Officer Aguayo with his temporary Washington State driver's license. Brar appeared to be extremely nervous, his hands were shaking, and he failed to make normal eye contact. Officer Aguayo asked Brar to step out of the vehicle.

b. Officer Aguayo asked Brar if he had illegal drugs or contraband inside his vehicle which he responded that he did not. Officer Aguayo asked Brar for consent to search the vehicle which Brar granted. Officer Aguayo also requested a K-9 sniff of the trailer. The K-9 alerted to the presence of narcotics at the rear of the trailer. Officer Aguayo then initiated a search of the trailer, which revealed six cardboard boxes with black bands around them. Upon opening one of the boxes, Officer Aguayo observed what appeared to be methamphetamine. The substance was not field tested due to fentanyl safety concerns.

c. The semi-truck and trailer was towed to a nearby CHP facility where I assisted in opening the six boxes and counted 100 packages weighing approximately five pounds each for a total of approximately 500 pounds. On August 30, 2022, I conducted a field test of the substance which displayed a positive result for methamphetamine.

37. On August 24, 2022, I showed RNSP surveillance officers a photo of BOU and they confirmed that this was the individual that conducted an exchange with Brar. I also confirmed with RNSP officers that the boxes that were located in the truck were consistent with the items they observed on surveillance.

I. Seizure #8: 40 Kilograms of Cocaine on August 29, 2022

38. On or about August 29, 2022, at 8:00 a.m., five RNSP officers established surveillance at and around the Shorb Residence (Officers Garrido, Packham, Millen, and Boyington). Based on my conversations with the RNSP officers, I learned the following:

a. At 7:50 p.m., BOU departed the Shorb Residence driving a black Mitsubishi Outlander SUV (the "Mitsubishi Outlander").¹² BOU drove to the city of Hesperia, California and arrived at a gas station. BOU appeared to circle the area surrounding the gas station before locating a semi-truck bearing Ontario license plate number J7328H. The two vehicles appeared to drive in tandem to a dirt lot where they both parked. A driver and a passenger from the semi-truck later identified by Barstow Police Officer Carson as Pargat Singh ("Pargat") and Kulvinder Singh ("Kulvinder") got out of the semi-truck. BOU drove towards the cab of the semi-truck and then backed the Mitsubishi Outlander up so the rear hatch of the vehicle was side by side with the back doors of the semi-truck. One of the occupants of the semi-truck opened the rear trailer doors while BOU got out of the Mitsubishi Outlander, walked to the rear hatch, and opened it. Pargat and Kulvinder

¹² On August 31, 2022, I spoke with a representative from Enterprise-Rent-A-Car. The representative informed me that BOU rented the Mitsubishi Outlander under his name on August 25, 2022 and as of August 31, 2022 he was still in possession of the vehicle.

grabbed one box and they both carried it over to the semi-truck where they loaded it inside. The box appeared to be heavy. BOU carried a second box over to the semi-truck where it was also loaded by Pargat and Kulvinder. BOU then entered the driver's side of the Mitsubishi Outlander and left.

b. Pargat and Kulvinder got inside the semi-truck and drove down a small cul-de-sac street a short distance away. Pargat and Kulvinder got out of the semi-truck and opened both trailer doors. Pargat and Kulvinder got inside the trailer and shut the doors. Both Pargat and Kulvinder were inside the trailer for approximately 5-10 minutes before re-emerging and getting back inside the semi-truck, departing the area and getting on the 15 North Freeway. Investigators contacted Barstow Police Department and requested a traffic stop of the semi-truck.

39. According to the Barstow Police Department report of the incident, I learned the following:

a. At 11:26 p.m., Barstow Police Officer Carson located the semi-truck on the 15 North Freeway and observed that the origin of the license plate affixed to the vehicle was obscured. Officer Carson initiated a traffic stop of the semi-truck for a violation of California Vehicle Code Section 5201 (failure to fasten a license plate) at Avenue L off of the 15 North Freeway. Barstow K-9 Officer Jaramillo, who was also in the area, joined the traffic stop to assist Officer Carson.

b. Officers identified Pargat as the driver of the semi-truck by his Ontario Canada driver's license. The passenger was also identified by his Ontario driver's license as Kulvinder. Officer Jaramillo asked Pargat, the driver, if he could search the

semi-truck to which Pargat responded that he could. Officer Jaramillo deployed his K-9 around the vehicle. The K-9 alerted to the rear of semi-truck trailer. Officer Jaramillo and Officer Carson initiated a search of the trailer. They observed two large cardboard boxes a few rows of boxes back that stood out from the rest of the load. Officers lifted the boxes and observed they were heavy. Officer Carson cut open the two boxes and observed they contained 40 bricks containing a white powdery substance that appeared to be cocaine based on Officer Carson's training and experience. The substance was not field tested.

40. On August 31, 2022, I showed RNSP surveillance officers a photo of BOU and they confirmed that this was the individual that conducted an exchange the night of August 29, 2022.

J. Evidence of Probable Flight and Seizure of 48 Kilograms of Suspected Cocaine

41. Based on my conversations with the RNSP Officer Packham, I learned the following:

a. On August 31, 2022, at 11:45 a.m., RNSP officers saw BOU driving the Mitsubishi Outlander to a Budget rental car facility in Alhambra, California. BOU parked the vehicle near the facility, went inside the business, and departed the area driving a silver Toyota Camry that was registered to Budget Rent a Car. At 4:00 p.m., BOU was observed arriving back in the area of the Mitsubishi Outlander on foot. BOU entered the Mitsubishi Outlander and drove to an Enterprise Rent-A-Car facility also in Alhambra and turned the vehicle in. BOU exited the Enterprise facility and walked southbound. BOU continued walking until he arrived at a parking lot where the Toyota Camry was located. BOU entered the driver's seat

and departed. BOU later arrived back at the Shorb Residence where he was observed entering the garage in the Toyota Camry.

b. At 7:15 p.m., BOU was observed exiting the garage of the Shorb Residence driving a gray Dodge Caravan that was not registered to him. BOU drove the Caravan to the city of Pasadena and arrived at a Public Storage facility located at 150 N. Halstead St., in Pasadena California. BOU entered a gate code to pass through the outer gates of the facility and inside. BOU drove to the front of a particular storage unit, got out of the Caravan, and using a key, BOU unlocked the unit.

c. BOU opened the rolling door belonging to the unit, got back inside the Caravan and backed the vehicle inside the unit. From the inside, BOU closed the rolling door of the storage unit and remained inside for approximately 15-20 minutes. BOU then emerged from the storage unit, locked the door, and walked out of the Public Storage facility (leaving the Caravan inside the unit). BOU walked to a nearby retail store and sat outside for approximately 20 minutes. A Toyota Prius arrived in the front of the retail store driven by an unknown individual and BOU got into the passenger seat. The Toyota Prius drove to a Dominos Pizza where BOU exited the Toyota Prius and it departed the area. BOU was later observed walking back to the Shorb Residence and going inside.

42. On September 1, 2022, the Honorable Alka Sagar authorized five warrants authorizing the search of the following: the Shorb Residence, the storage unit, the Toyota Camry, the Caravan, and BOU, in Case Nos. 22-MJ-03474 through 22-MJ-03478. The warrants were executed last night and law enforcement found approximately 48 kilograms of suspected cocaine inside the Caravan, which was inside

the storage unit. The suspected cocaine was contained inside of two sophisticated hidden compartments in the vehicle. The suspected cocaine was packaged in vacuum sealed bricks, which based on my training and experience, I believe are one-kilogram cocaine bricks. Inside the Shorb Residence, law enforcement found a handwritten note with what appeared to be unfinished instructions on how to find the storage unit, the passcode for the lock, and where the Caravan's keys were located. The Shorb Residence also contained packaging materials, shipping labels, and chemicals used to clean the cocaine. BOU was arrested on September 2, 2022.

a. Based on my training and experience, and my knowledge of this investigation, I believe that BOU was packing up and preparing to leave the United States to go back to Canada. I believe that the handwritten note was intended to be read by the next Canadian stash house operator who was going to take over BOU's role.

K. Black Market Value

43. Based on my training and experience and in consulting with other law enforcement officers, I know that one kilogram of cocaine has a resale value of approximately \$25,000 in Los Angeles and that one pound of methamphetamine has a resale value of approximately \$1,500 in Los Angeles. I also know that typically cocaine and methamphetamine sell for a much higher price in Canada, depending on the city. Thus, from the above seizures alone, BOU has distributed drugs with a value of at least \$9.8 million in Los Angeles, and likely several times that amount if exported and resold in Canada.

IV. CONCLUSION

For all of the reasons described above, there is probable cause to believe that BOU has committed a violation of 21 U.S.C.

§ 841(a)(1), (b)(1)(A)(ii)(II): distribution of cocaine on June 28, 2022.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 2nd day of
September, 2022.

/S/
HONORABLE MICHAEL R. WILNER
UNITED STATES MAGISTRATE JUDGE